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8 Attorneys for Charlie's Enterprises, Inc., d/b/a  
9 OK Produce and CDS Distributing, Inc.

10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 In Re:

CASE NO. 13-53893-ASW

14 MI PUEBLO SAN JOSE, INC.,  
15 fdba MI PUEBLO MOUNTAIN VIEW, INC.,  
16 fdba MI PUEBLO DOWNTOWN, INC.,  
17 fdba MI PUEBLO FOOD CENTER,

CHAPTER 11

18 Debtors.

19 NOTICE OF APPEARANCE OF COUNSEL  
20 AND REQUEST FOR NOTICES

21 PLEASE TAKE NOTICE that Charlie's Enterprises, Inc., d/b/a OK  
22 Produce and CDS Distributing, Inc., PACA trust beneficiaries of the  
23 Debtors, Mi Pueblo San Jose, Inc., fdba Mi Pueblo Mountain View, Inc., fdba Mi  
24 Pueblo Downtown, Inc., fdba Mi Pueblo Food Center enters an appearance in  
25 the above-captioned case through its counsel, Lawrence H. Meuers, and the  
26 Meuers Law Firm, P.L., pursuant to 11 U.S.C. §§342(a) and 1109(b), Federal  
27

1 Rules of Bankruptcy Procedure 2002, 3017, 4001, 9007, and 9010, and the  
2 Local Rules of this Court.

3  
4 The undersigned counsel requests all orders and notices, pleadings,  
5 papers, hearings, meetings, and all other matters in connection with the  
6 above-captioned case, whether written or oral, transmitted via e-mail or  
7 conveyed by U.S. mail, hand-delivery, telephone, facsimile or otherwise,  
8 which effect the above named parties in connection with the above-  
9 referenced matter, be served upon:  
10  
11

12 **Lawrence H. Meuers**  
13 **MEUERS LAW FIRM, P.L.**  
14 **5395 Park Central Court**  
15 **Naples, FL 34109**  
16 **Telephone: (239) 513-9191**  
17 **Facsimile: (239) 513-9677**  
**Email: lmeuers@meuerslawfirm.com**

18 The undersigned counsel also requests to be added to the service  
19 matrix and appearance list for the above named parties as their counsel of  
20 record.  
21

22 This entry of appearance and request for notice is without prejudice  
23 to Charlie's Enterprises, Inc., d/b/a OK Produce and CDS Distributing,  
24 Inc.'s rights, remedies, and claims against other entities, or any objection  
25 that may be made to the jurisdiction or venue of the Court or venue of this  
26  
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1 case, and shall not be deemed or construed to be a waiver of these parties'  
2 rights (1) to have final orders in noncore matters entered only after de novo  
3 review by a District Judge, (2) to trial by jury in any proceeding so triable in  
4 this case or any case, controversy, or proceeding related to this case, (3) to  
5 have the District Court withdraw the reference in any matter subject to  
6 mandatory or discretionary withdrawal, or (4) any other rights, claims,  
7 actions, setoffs, recoupments to which these parties is or may be entitled, in  
8 law or in equity, all of which rights, claims, actions, defenses, setoffs, and  
9 recoupments the parties hereby expressly reserve.  
10  
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14 Respectfully submitted this 23<sup>th</sup> day of July, 2013.

15 **MEUERS LAW FIRM, P.L.**

16  
17 By: s/Lawrence H. Meuers

18 Lawrence H. Meuers

19 SBN: 197663

20 5395 Park Central Court

21 Naples, FL 34109

22 Telephone: (239) 513-9191

23 Facsimile: (239) 513-9677

24 *Attorneys for Charlie's Enterprises,*  
25 *Inc., d/b/a Ok Produce and CDS*  
26 *Distributing, Inc.*  
27  
28

**PROOF OF SERVICE**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 5395 Park Central Court, Naples, FL 34109.

I certify on July 23, 2013 that the Notice of Appearance of Counsel and Request for Notice, was served upon the following parties in this action by transmitting a true and correct copy of this pleading to:

☒ By via transmission of Notices of Electronic Filing generated by CM/ECF.

Attorney for Debtor:  
Heinz Binder, Esq.  
Robert G. Harris, Esq.  
David B. Rao, Esq.  
Roya Shakoori, Esq.  
Wendy W. Smith, Esq.  
Law Offices of Binder & Malter  
2775 Park Avenue  
Santa Clara, CA 95050

Attorney for Wells Fargo:  
Robert B. Kaplan, Esq.  
Walter W. Gouldsbury, III, Esq.  
Jeffer, Mangels, et al.  
Two Embarcadero Center  
5<sup>th</sup> Floor  
San Francisco, CA 94111

Attorney for Cha Cha Enterprises, LLC  
Paul J. Pascuzzi, Esq.  
Jennifer E. Niemann, Esq.  
Felderstein, Fitzgerald, et al.  
400 Capital Mall  
Suite 1750  
Sacramento, CA 95814

Special Counsel to Debtor:  
Wm. Thomas Lewis, Esq.  
Robertson & Lewis  
150 Almaden Boulevard  
Suite 950  
San Jose, CA 95113

☒ I am readily familiar with the business practice for collection and processing for correspondence for mailing with the United States Postal Service. I know that the correspondence is deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection, and mailing on this date, following ordinary business practice in the United States mailed at Naples, Florida.

Debtor:  
Mi Pueblo San Jose, Inc.  
P.O. Box 3288  
San Jose, CA 95156

United States Trustee  
Office of the U.S. Trustee/SJ  
U.S. Federal Building  
280 S. 1<sup>st</sup> Street, #268  
San Jose, CA 95113-3004

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Executed on July 23, 2013 in Naples, Florida.

- ☐ (State) I declare under penalty of perjury under the laws of the State of Florida that the above is true and correct.
- ☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

s/ Luanne M. Rogers